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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 HUMBERTO GUZMAN-VIRGEN,
15 Defendant.

Case No. 2:21-cr-00004-RFB-DJA

**STIPULATION TO CONTINUE
CHANGE OF PLEA/SENTENCING
HEARING
(Second Request)**

16 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
17 Acting United States Attorney, and Jared Grimmer, Assistant United States Attorney, counsel
18 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Andrew
19 Wong, Assistant Federal Public Defender, counsel for Humberto Guzman-Virgen, that the
20 Change of Plea/Sentencing Hearing currently scheduled on March 18, 2021 at 1:00 pm, be
21 vacated and continued to a date and time convenient to the Court, but no sooner than thirty (30)
22 days.

23 This Stipulation is entered into for the following reasons:

24 1. Defense counsel needs additional time to review the presentence report and
25 discuss its contents with Mr. Guzman-Virgen.
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2. In order to ensure continuity of defense counsel, the parties request that the change of plea and sentencing be continued.

3. The defendant is in custody and agrees with the need for the continuance.

4. The parties agree to the continuance.

This is the second request for a continuance of the Change of Plea/Sentencing hearing.

DATED this 16th day of March, 2021.

RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

By /s/ Andrew Wong

ANDREW WONG
Assistant Federal Public Defender

By /s/ Jared Grimmer

JARED GRIMMER
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 HUMBERTO GUZMAN-VIRGEN,

7 Defendant.

Case No. 2:21-cr-00004-RFB-DJA

ORDER

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10 IT IS THEREFORE ORDERED that the Change of Plea/Sentencing hearing currently
11 scheduled for Thursday, March 18, 2021 at 1:00 p.m., be vacated and continued to
12 April 29, 2021 at the hour of 1:00 p.m.; or to a time and date convenient to the court.

13 DATED this 16th day of March, 2021.

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16 RICHARD F. BOULWARE, II
17 UNITED STATES DISTRICT JUDGE
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